



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUN 22 2015

OFFICE OF
AIR, WASTE AND
TOXICS

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6/22/15

Ms. Georgia Baxter, Chief Executive Office
J.H. Baxter and Co.
PO Box 5902
San Mateo, California 94402

Re: Comments on Workplan for Installation of Oxygen Infusers and Rehabilitation of Recirculation Trench
Former J.H. Baxter & Co. (Baxter), Arlington Facility (Facility)
§ 7003 Administrative Order on Consent (Order)
Docket No.: RCRA-10-2001-0086
EPA ID No.: WAD 05382 3019

Dear Ms. Baxter:

The U.S. Environmental Protection Agency, Region 10 has received Baxter's *Workplan for Installation of Oxygen Infusers and Rehabilitation of Recirculation Trench (Workplan)*, dated May 2015, submitted by GSI Water Solutions, Inc. by email on May 18, 2015. This Workplan is required under the above referenced Order. The EPA's comments on the Workplan are below.

Page 3, Recirculation trench rehabilitation, paragraphs 3iii, 3iv, 3vi:

References are made to drilling a series of geotechnical borings within the existing trench. Open bottom pipe casings must also be installed in the borings so that the top of the casing is at the bottom of the limestone treatment material in the trench.

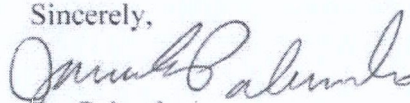
Figure 5:

Revise the figure and the legend to show that the crushed rock or gravel will be installed inside of an open bottom pipe casing.

The reason for these changes is that a boring filled with rock or gravel without a casing will not force the water to flow out of the additional limestone treatment material.

In accordance with Paragraph 27 of the Order, submit a revised Workplan which addresses these comments within fifteen days of receipt of this letter. Please contact me at (206) 553-6702 or at Palumbo.Jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311 or MacDonald.Jennifer@epa.gov, if you have any questions.

Sincerely,


Jan Palumbo
Project Coordinator

FILE COPY

cc: Mr James C. Hanken
Wolfstone, Panchot & Bloch

Mr. Edward C. Smith
McFarland Cascade Holdings Inc.
Stella-Jones Corp.

Ms. Heidi Blischke
GSI Water Solutions, Inc.

Ms. Rue Ann Thomas
Nattura Group

Mr. Dean Yasuda
Washington State Department of Ecology

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1. Article Addressed to:

Ms. Georgia Baxter
Chief Executive Office
J.H. Baxter and Co.
P.O. Box 4902
San Mateo, CA 94402

2. Article Number

7014 1200 0001 4321 0530

PS Form 3811, July 2013

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6/18/15

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YES/NO

Name:

BLANKENSHIP

KNITTEL

CASTRILLI

VALDEZ

HEDEEN

Initials/Date:

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6/25/15

RA OFFICE CONCURRENCE/SIGNATURE:

Name:

Initials/Date:

cc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken
Wolfstone, Panchot & Bloch
1111 Third Ave., Suite 1800
Seattle WA 98101

Ms. Heidi Blischke
GSI Water Solutions, Inc.
55 SW Yamhill St., Suite 300
Portland, OR 97204

Ms. RueAnn Thomas
Environmental Programs Director
J.H. Baxter & Co.
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Edward C. Smith
Senior Environmental Manager
McFarland Cascade Holdings
Inc.
P.O. Box 1496
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Mr. Dean Yasuda
Washington Department of
Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452

bcc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

J. Palumbo (AWT-121)

Mailing Deadline: 6/22/15

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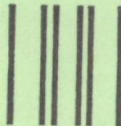
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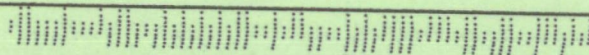
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Ms. Jan Palumbo
U.S. EPA
1200 Sixth Avenue
Suite 900, MT-OAWT-150
Seattle, WA 98101

Received

JUL 01 2015

Office of Air, Wa



Region 10 Routing and Concurrence

Author:	Jan Palumbo	Date:	6/18/15
Addressee:	Georgia Baxter ✓		
Subject:	Comments on Workplan for Installation of Oxygen Infusers and Rehabilitation of Recirculation Trench		
File Location/Name:			

PROGRAM ADMIN REVIEW:

Name:	MCLEOD X	PALUMBO <i>[Signature]</i>	MACDONALD	FUENTES X <i>[Signature]</i>	POLICY FILE YES/NO	RCRAINFO YES/NO
Initials/Date:		6/18/15		6/18/15		

PROGRAM OFFICE CONCURRENCE:

Name:	BLANKENSHIP	KNITTEL	CASTRILLI X	VALDEZ	HEDEEN		
Initials/Date:			<i>[Signature]</i>				

RA OFFICE CONCURRENCE/SIGNATURE:

Name:						
Initials/Date:						

cc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken Wolfstone, Panchot & Bloch 1111 Third Ave., Suite 1800 Seattle WA 98101	Ms. Heidi Blischke GSI Water Solutions, Inc. 55 SW Yamhill St., Suite 300 Portland, OR 97204	Ms. RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. P.O. Box 10797 Eugene, OR 97440-2797
Edward C. Smith Senior Environmental Manager McFarland Cascade Holdings Inc. P.O. Box 1496 Tacoma, WA 98401-1496		Mr. Dean Yasuda Washington Department of Ecology 3190 160th Ave SE Bellevue, WA 98008-5452

bcc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

	J. Palumbo (AWT-121)	
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